

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

<b>JEFFERSON-PILOT LIFE</b>	)	<b>CASE NO. C-1-02-479</b>
<b>INSURANCE CO.,</b>	:	
	)	<b>JUDGE MICHAEL R. BARRETT</b>
<b>Plaintiff</b>	:	<b>Magistrate Judge Hogan</b>
	)	
<b>vs.</b>	:	
	)	
<b>CHRISTOPHER L. KEARNEY,</b>	:	
	)	
<b>Defendant.</b>	:	
	)	

**DEFENDANT'S MOTION FOR LEAVE TO FILE UNDER SEAL  
EXHIBITS 2, 8, AND 18 (subparts 1-5 of 11) TO DOCUMENT 159**

The defendant Christopher Kearney hereby moves this Court for leave to file under seal Exhibits 2, 8, and 18 (subparts 1-5 of 11) to Document 159. A memorandum in support is attached.

Respectfully submitted,

s/ Michael A. Roberts  
Michael A. Roberts (0047129)  
*Attorney for Defendant*  
GRAYDON HEAD & RITCHEY LLP  
1900 Fifth Third Center  
511 Walnut Street  
Cincinnati, OH 45202-3157  
Phone: (513) 629-2799  
Fax: (513) 651-3836  
E-mail: mroberts@graydon.com

**MEMORANDUM IN SUPPORT**

At plaintiff's insistence – and defendant's opposition – defendant is hereby moving to temporarily file under seal Exhibits 2 (William Hughes May 2007 deposition testimony) and 8 (Bob Mills May 2007 deposition testimony) to Document 159. Defendant is also

hereby moving for leave to file under seal the first 5 of 11 subparts to Exhibit 18 to Document 159 as they contain sensitive and private medical information relating to the defendant.

Respectfully submitted,

s/ Michael A. Roberts

Michael A. Roberts, Esq.  
GRAYDON HEAD & RITCHIEY LLP  
511 Walnut Street, Suite 1900  
Cincinnati, OH 45202  
(513) 629-2799  
(513) 651-3836 - fax  
[mroberts@graydon.com](mailto:mroberts@graydon.com)

**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing has been filed electronically with the court and thereby served this 13th day of July, 2007, upon William R. Ellis, Wood & Lamping LLP, 600 Vine Street, Suite 2500, Cincinnati, OH 45202 and John E. Meagher, Esq., Shutts & Bowen LLP, 1500 Miami Center, 201 South Biscayne Boulevard, Miami, Florida 33131.

s/ Michael A. Roberts